



Post Office Box 1787 • Olympia, WA 98507-1787 • 360-352-0514 • FAX 360-352-4579

August 12, 2005

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504-2400

RE: House-banked card games – Wager Limits: WAC 230-40-120(5)

Dear Commissioners Ludwig, Parker, and Niemi & Ellis:

On behalf of our members, we submit the enclosed petition for rule change to amend WAC 230-40-120(5). The requested change would simplify the rule by allowing licensees authorized to conduct house-banked card games to offer two-hundred dollar wager limits on all tables.

We look forward to being provided the opportunity to present arguments on this issue.

Thank you in advance for your consideration of this request.

Sincerely,

Dolores A. Chiechi
Executive Director

Attachments



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)

The Office of Financial Management (OFM) has adopted this form for members of the public who wish to petition a state agency to adopt, amend, or repeal an administrative rule (regulation). Full consideration will be given to a petitioner's request.

To obtain this form in an alternate format, call OFM at (360) 902-0555 or TTY (360) 664-9437.

Please complete the following:

PETITIONER'S NAME (PLEASE PRINT)

Recreational Gaming Association

TELEPHONE NUMBER (INCLUDE AREA CODE)

360-352-0514

STREET ADDRESS

PO BOX NUMBER

CITY

STATE

ZIP CODE

Post Office Box 1787

Olympia

WA

98507-1787

AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE, IF KNOWN

WSGC

If unknown, call (360) 753-7470 for mailing information

Please submit completed and signed form to the "Rules Coordinator" at the appropriate state agency. The agency will contact you within 60 days.

Check all that apply below and explain on the back of this form with examples. Whenever possible, attach suggested language. You may attach other pages, if needed.

I believe a new rule should be developed.

- ☐ The subject of this rule is:
- ☐ The rule will affect the following people:
- ☐ The need for the rule is

I believe this rule should be changed or repealed because (check one or more):

- ☐ It does not do what it was intended to do.
- ☐ It imposes unreasonable costs.
- ☐ It is applied differently to public and private parties.
- ☐ It is not clear.
- ☐ It is no longer needed.
- ☐ It is not authorized. The agency has no authority to make this rule.
- ☐ It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known
- ☐ It duplicates another federal, state, or local law or rule. Please list number of the duplicate law or rule, if known

☒ Other (please explain): It would simplify the rule to allow licensees to offer two-hundred dollar betting limits on all house-banked card games.

PETITIONER'S SIGNATURE

DATE

Rolores A. Chiechi on behalf of the Recreational Gaming Assoc | 8-12-05



Post Office Box 1787 • Olympia, WA 98507-1787 • 360-352-0514 • FAX 360-352-4579

August 23, 2005

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504-2400

RE: House-banked card games – Wager Limits: WAC 230-40-120(5)

Dear Commissioners Ludwig, Parker, and Niemi & Ellis:

On behalf of our members, we submitted a petition for rule change to amend WAC 230-40-120(5). The requested change would simplify the rule by allowing licensees authorized to conduct house-banked card games to offer two-hundred dollar wager limits on all tables.

As mentioned in our filing, we look forward to being provided the opportunity to elaborate on the following arguments as they relate to our request:

- ✓ Two hundred dollar betting limits have been in place for fourteen months;
- ✓ Minimal regulatory concerns, however regulatory burdens may have increased due to agents having to monitor the number of tables at the \$200 limit;
- ✓ Allowing uniform limits on all tables would make regulation more consistent;
- ✓ Player/market demand \$200 limits on a variety of games, and
- ✓ Player confusion has been an issue in determining wager limits on select tables.

We appreciate your consideration and thank you in advance for the opportunity to present more information on this issue over the next few months.

Sincerely,

Dolores A. Chiechi
Executive Director